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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ZHK INC., a Nevada corporation;

Plaintiff,

vs.

WILMINGTON TRUST, N.A.; KENNETH
DELMAR JONES JR FAMILY TRUST; DOES
1-100, INCLUSIVE, AND ROES 1-100,
INCLUSIVE.

Defendants.

Case No.: 2:17-cv-01078-JCM-VCF

STIPULATION AND ORDER TO
STAY DISCOVERY PENDING
RESOLUTION OF MOTIONS

Plaintiff, ZHK Inc., ("ZHK") by and through Sarah A. Morris, Esq. and Timothy A. Wiseman, Esq. of the law firm Morris Law Center; Wilmington Trust, NA, Successor Trustee to Citibank, N.A. As Trustee F/B/O Holders of Structured Asset Mortgage Investments II, Inc., Bear Stearns Alt-A Trust 2006-6, Mortgage Pass-Through Certificates Series 2006-6 ("Defendant") by and through Sylvia O. Semper, Esq. of the law firm Ballard Spahr, hereby agree and stipulate as follows:¹

¹ Kenneth Delmar Jones Jr Family Trust has not filed into this case.

1 IT IS HEREBY AGREED AND STIPULATED, that the parties jointly request an
2 Order staying all discovery until the pending Motion to Remand, Motion to
3 Consolidate, and Motion to Amend (Doc. 7, Doc. 8, Doc. 9, Doc. 10, Doc 11, Doc. 12, and
4 Doc 17) are ruled upon.

5 A motion to consolidate this case into the related case has also been filed. (*See*
6 Doc. 6). Further, the Motion to Amend, if granted, would add additional parties to this
7 case who will be entitled to discovery and their presence may also impact the discovery
8 conducted by the parties currently in this case. (Doc. 17). The Motion to Remand, if
9 granted, would remove this case from this Court's docket. (Doc. 18). Accordingly, it
10 would not be efficient for the parties to proceed with discovery in this case while those
11 motions are pending.

12 Therefore, the parties have good cause for requesting the stay due to the possible
13 effect of resolving all claims or issues in this case if the pending motions are granted.
14 The parties believe a stay of the matter to be appropriate to conserve judicial resources.
15 The parties have entered into the agreement in good faith and not for purposes of delay.

16 IT IS FURTHER AGREED AND STIPULATED that once the stay is lifted, any
17 remaining parties will submit a renewed discovery schedule 30-days from the date the
18 stay is lifted.

19 Dated: October 15, 2017

Dated: October 16, 2017

20 MORRIS LAW CENTER

BALLARD SPAHR LLP

21
22 By: /s/ Timothy A. Wiseman
23 Sarah A. Morris, Esq.
24 Nevada Bar No. 8461
25 Timothy A. Wiseman, Esq.
26 Nevada Bar No. 13786
Attorneys for Plaintiff, ZHK

By: /s/ Sylvia O. Semper
Abran E. Vigil, Esq.
Nevada Bar No. 7548
Sylvia O. Semper, Esq.
Nevada Bar No. 12863
Attorney for Defendant, Wilmington Trust
(signed by filing attorney with permission)

ORDER

IT IS SO ORDERED this 17th day of October, 2017.



UNITED STATES MAGISTRATE JUDGE

Respectfully submitted:

By: /s/ Timothy A. Wiseman

Timothy A. Wiseman

Nevada Bar No. 13786

Attorneys for Defendant, ZHK

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO STAY DISCOVERY PENDING MOTIONS TO DISMISS** by the method indicated:

_____ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).

_____ **BY E-MAIL:** by transmitting via e-mail the document(s) listed above to the email addresses set forth below and/or included on the Court's Service List for the above-referenced case.

_____ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

_____ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

_____ **BY PERSONAL DELIVERY:** by causing personal delivery via messenger service of the document(s) listed above to the person(s) at the address(es) set forth below.

_____ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

_____ **X** _____
and addressed to the following:

Ballard Spahr LLP

Sylvia O. Semper sempers@ballardspahr.com

Abran E. Vigil vigila@ballardspahr.com

Dated this 17th day of October, 2017



An employee of Morris Law Center